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June 25<sup>th</sup>, 2014

**VIA E-MAIL & FED EX**

**Honorable Joel A. Pisano, U.S.D.J.**  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

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**Re: Philp (Plaintiff), pro se vs.  
Ross University School of Medicine, et al (Defendants).  
Civil Action Case Number: 3:14-cv-00556-JAP-DEA**

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH CLERK

Dear Honorable Judge Pisano:

Subsequent to my June 10, 2014 letter to this Court, the Defendants by their legal representatives (attorneys Travisano and Gyves) submitted to the Court a letter dated June 18, 2014, to further support their Motion to have this case be dismissed.

Your Honor, I will be the first to admit that the case I presented to this Court has flaws. However, this case has important merits and is most worthy of the Court's time and inquiry. I ask for the Court's understanding, grace, and wisdom as it views this case.

The Defendants, Ross University School of Medicine, et al, in their culminating act of **egregiously and wrongfully expelling me, acted unjust, unlawful, and criminally, and perpetrated fraud** as they endeavor to financially enrich themselves.

I again ask the Court to not dismiss this case and to grant the time and efforts to further inquire, to learn and understand what happened to me at Ross, to look at the facts, to get to the heart of the matter before us, to see exactly what the Defendants did, and to remedy this matter with a just and fair determination, an amicable resolution, and the necessary compensation.

Your Honor, I have read through the June 18, 2014 letter by the Defendants' attorneys Travisano and Gyves. I appreciate the Court's patience, thank the Court in advance, and now take the opportunity to make these few, but critically important points.

**Point 1:**  
**THE DEFENDANTS HAVE ASKED THIS COURT TO BE FAIR TO THEM WHEN  
THEY WERE NEVER FAIR TO ME.**

Immediately after my June 10<sup>th</sup> letter the Defendants' attorneys begged the Court for time to make their necessary response. These attorneys have so beautifully underlined a

foundation principle of American justice: **FUNDAMENTAL FAIRNESS AND DUE PROCESS RIGHTS.**

Never did the Ross administrators told me who my accusers were. Never did the Ross administrators told and/or provide written documents to me of what charges/allegations I am coming before their Grievance Committee to answer. Never did the Ross administrators give me adequate time to prepare a necessary and proper response before I sat before their Grievance Committee.

However, we see that the Defendants' attorneys begged the Court for time to prepare an adequate response to my June 10<sup>th</sup> letter. In fact, they took a full week to prepare their response!!!

Weren't I too worthy and deserving of time to adequately prepare to answer/respond to any accusations/allegations/charges/complaints against me before I sat at Ross's Grievance Committee hearings?

**Point 2:**

**THE DEFENDANTS' ATTORNEYS (TRAVISANO AND GYVES) ARE EXHIBITING A SERIOUS LACK OF INTEGRITY, ARE ACTING UNPROFESSIONAL, ARE RECKLESSLY IRRESPONSIBLE, AND ARE DISRESPECTING AND MISLEADING THIS COURT WITH FALSEHOODS AND BLANTANT LIES.**

Your Honor, as the information I presented in my June 10<sup>th</sup> letter shows, I was sent emails from the Ross administrators and abruptly told to come to Grievance Committee meeting.

Your Honor, no stipulation of charges/allegations was given to me before and/or while I sat at the Grievance Committee meetings.

Your Honor, after a Grievance Committee meeting there is supposed to be what is called a **"finding of facts"** and/or written information/documentation given to me as to what I did wrong and what "behaviors" I needed to address. **NO SUCH "FINDING OF FACTS" AND/OR WRITTEN INFORMATION/DOCUMENTATION WAS GIVEN TO ME.**

Your Honor, every time I left the Grievance Committee meetings I wondered why is it they called me before the Grievance Committee.

To this very day and with attempts by Glantzlaw attorney (writing on my behalf), Ross has provide nothing specific, real, and/or concrete as to why they expelled me. They cited nothing in the Student Handbook and/or Student Honor Code that I violated and thus warranted the most serious disciplinary act of expulsion.

Yet, attorneys Travisano and Gyves said I was talking **"nonsense"** by saying that "Ross hid the ball with respect its reasons for expelling" me. **I AM NOT TALKING "NONSENSE"; I AM SPEAKING THE TRUTH!!!**

Attorneys Travisano and Gyves stated that I "was told explicitly and repeatedly" what the nature of the complaints against me was and that I "knew exactly" why I was expelled.

Sitting at the expulsion hearing on March 1, 2007, before Dean Coleman and her assistant Dr. Meyers, I asked what were the complaints and who made the complaints against me, I was emphatically told "we can't tell you...we are not going to go through this again with you..."

Again, no stipulation of charges/allegations was given to me before and/or during the Grievance Committee meetings and no "findings of facts" and pertinent information was given to me after those meetings. Therefore, why do attorneys Travisano and Gyves said I "was told explicitly and repeatedly" what the complaints were and that I "knew exactly" why I was expelled. **This is just blatantly irresponsible, reckless, false, untrue, and misleading statements by attorneys Travisano and Gyves.**

I beg the Court to demand of attorneys Travisano and Gyves to present their facts/evidence of me being "explicitly and repeatedly" told what the complaints/charges/allegations against me were.

Your Honor, attorneys Travisano and Gyves said I "was represented by counsel" at the appeals hearing (March 23, 2007) before Ross's President Dr. Shepherd.

According to the Ross Student Handbook I could have the benefit of professional counsel and a student body representative should be present at the Grievance Committee meetings. **No student representative was present at any of those meetings and I never had the help/benefit of professional counsel.**

Particularly, at that March 23 appeals hearing Dr. Shepherd explicitly told me that we were not in a court of law, that he only wanted to hear from me, and that he did not want to hear anything from the counsel I had present. **No counsel spoke for me at that appeals hearing, so why do attorneys Travisano and Gyves say I was represented by counsel?** This is a completely **untrue statement** by Travisano and Gyves.

**Point 3:**

**THE DEFENDANTS' ATTORNEYS (TRAVISANO AND GYVES) ARE ASSERTING AND FIXATING ON MY CLAIMS BEING "TIME-BARRED".**

Your Honor, in my June 10<sup>th</sup> letter, page 2, paragraphs 3 – 6, I have laid down the more significant and honest reasons why and what caused me to not come before this Court at an earlier time. Thus, there are those **extenuating circumstances**.

I will reiterate, that particularly when Ross's attorney Gyves, in response to a Glantzlaw July 8, 2011 letter requesting specific information for the expulsion, stated in his August 22, 2011 letter that "this matter remains under review", **this statement led me to believe that the matter is still open** and there was the possibility of some legal and/or out-of-court discussion and/or opportunity to resolve the matter. However, when I received, **subsequent to August 22, 2011**, the definitive response from Ross to our Glantzlaw July 8, 2011 letter of request, then I considered it **the conclusive, no hope, end point** from which I should then proceed to file my law suit in the Federal Court.

**Point 4:**

**THE DEFENDANTS' ATTORNEYS (TRAVISANO AND GYVES) MAKE THE POINT THAT "NEW JERSEY LAW" DOES NOT RECOGNIZE SOME THINGS.**

Your Honor, again I am not an attorney, but I believe that I am filing my case in a US Federal Court and that Constitutional legal doctrine prevails here. For example, my right to due process, my right to be treated fair and equally, my right to not be treated cruelly and/or unusually, my right to be secure in [not arbitrarily deprived of] in my person and property, my right to freedom and to the pursue of my own happiness....all of which are granted to me as a US citizen be the US Constitution...and all of which were violated by Ross University School of Medicine, et al.

**Dr. Raymond Adebiyi**, Chairman of the Grievance Committee and essentially the "chief prosecutor" against me, **is Nigerian**. **Justin Bogwu was Nigerian! Ofonime Essien was Nigerian! Bennett Okororie was Nigerian! All these individuals (Bogwu, Essien, and Okororie) were Nigerians** and all were involved in deliberate harassment, provocation, and violence against me. To me it was clear they were deliberately acting to elicit certain bad responses from me, so as to generate affirmative and concrete evidence that Dr. Adebiyi could use against me. It seems fair to say that there was a conspiracy in operation. Also, **WHAT PUNISHMENTS AND/OR DISCIPLINARY ACTION DID THEY RECEIVE FOR THEIR BAD BEHAVIORS?**

**Point 5:**

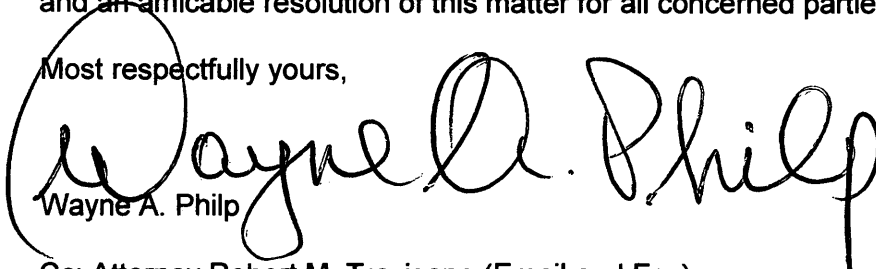
**HAVING OFFICIALLY ENROLLED, ROSS UNIVERSITY SCHOOL OF MEDICINE DOES HAVE A BINDING (Contractual) AGREEMENT TO PROVIDE ME WITH THE SERVICES, ENVIRONMENT, AND EDUCATION STIPULATED/ADVERTISED AND PROMISED TO ME.**

Your Honor, **that contractual agreement was significantly, blatantly, disregardingly, and egregiously breached** by the Defendants, Ross University School of Medicine, et al.

Your Honor, Courts have powers! Your Court has power! The power to preserve, protect, and promote what is in the best interest of our society; the power to level the playing field between the big/powerful and the small/weak and between the professional and the amateur; the power to restrain the aggressor and liberate the victim; and the power to restore the basic rights of the human person when such rights are dictatorially infringed, violated, or obliterated.

I, humbly and respectfully, ask that this case be NOT dismissed and that we proceed forward (a) to find the truth [and expose more untruths and falsehoods form the Defendants/Defendants' attorneys], (b) to remedy the disadvantageous situation and burden placed upon me, and (c) to exact fairness, justice, compensation, restoration, and an amicable resolution of this matter for all concerned parties.

Most respectfully yours,



Wayne A. Philp

Cc: Attorney Robert M. Travisano (Email and Fax)